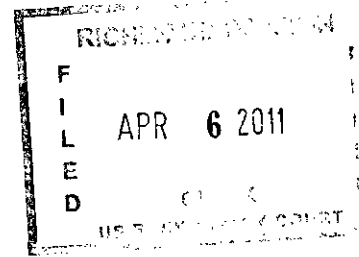


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UNITED STATES DISTRICT BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

CIRCUIT CITY STORES, INC.,
et al.,

Debtors.

Chapter 11

Case No. 08-35653

Jointly Administered

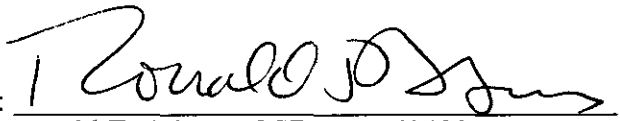
RESPONSE TO OMNIBUS OBJECTION TO ADMINISTRATIVE CLAIM

As noted in the Request for Administrative Expense, on August 14, 2009, Hayden Meadows, an Oregon joint venture, by and through Meadow Land Partnership paid the 2008 and 2009 real property taxes in the amount of \$78,277.14. The post-petition pro rata share was \$6,862.72. On February 26, 2010, Meadow Land Partnership received notice of the second deadline for filing administrative expense requests of March 31, 2010. Meadow Land Partnership's claim arose on August 14, 2009 when it paid the real property taxes for the benefit of the Debtor. The Joint Venture complied with the second deadline for filing Administrative

Expense Requests pursuant to the Notice and its administrative expense request for \$6,862.72 should be allowed.

DATED this 5th day of March, 2010.

BLACK HELTERLINE LLP

By: 

Ronald T. Adams, OSB No. 760400
(503) 224-5560

Of Attorneys for Creditor Hayden Meadows JV

CERTIFICATE OF SERVICE

I hereby certify that I filed the original of the foregoing **RESPONSE TO OMNIBUS OBJECTION TO ADMINISTRATIVE CLAIM** and the **DECLARATION OF RONALD TO ADAMS IN SUPPORT** with:

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street - Room 4000
Richmond, Virginia 23219

and that I served a true and correct copy of the foregoing **RESPONSE TO OMNIBUS OBJECTION TO ADMINISTRATIVE CLAIM** and the **DECLARATION OF RONALD TO ADAMS IN SUPPORT** upon:

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 21 Floor
Richmond, Virginia 23219

☐ by mailing a true copy thereof in a sealed, first-class postage prepaid envelope, addressed to said attorneys' addresses as shown above and deposited in the United States Mail at Portland, Oregon on the date set forth below.

☒ by sending a true copy thereof via overnight delivery in a sealed, prepaid envelope, addressed to the addresses as shown above on the date set forth below.

☐ by faxing a true copy thereof to said attorneys' facsimile numbers as shown above on the date set forth below.

DATED this 5th day of March, 2010.

BLACK HELTERLINE LLP

By: 

Ronald T. Adams, OSB No. 760400
(503) 224-5560
Of Attorneys for Creditor Hayden Meadows JV

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In re:

CIRCUIT CITY STORES, INC.,
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Chapter 11

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Jointly Administered

DECLARATION OF RONALD T. ADAMS IN SUPPORT OF RESPONSE TO OMNIBUS
OBJECTION TO ADMINISTRATIVE CLAIM

I, Ronald T. Adams, submit the following declaration:

1. I am the attorney for Hayden Meadows and I make this declaration based on personal knowledge.
2. As shown on Exhibit A to its claim, on August 14, 2009, Hayden Meadows, by and through Meadow Land Partnership paid the 2008 and 2009 real property taxes in the amount

of \$78,277.14.

3. On February 26, 2010, Meadow Land Partnership received notice of the second deadline for filing administrative expense requests. That deadline was March 21, 2010.


4. On March 16, 2010, Hayden Meadows filed its Request for Administrative expense.

Under penalty of perjury, the foregoing statements are true and correct to the best of my knowledge, information and belief.

DATED this 5th day of March, 2010.

BLACK HELTERLINE LLP

By:



Ronald T. Adams, OSB No. 760400

(503) 224-5560

Of Attorneys for Creditor Hayden Meadows JV